



413 North Calhoun Street
West Liberty, IA 52776
319-627-2145

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2018.

Date Filed: February 13, 2019

Name of Company covered by this certification: Liberty Communications

Form 499 Filer ID: 801069

Name of signatory: Jerry Melick

Title of signatory: President


I, Jerry Melick, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken action against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures



Statement of Compliance with CPNI

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Liberty Communication's billing system provides for compliance with this section. CPNI alerts and information is available on the screen anytime an account is pulled up and is readily accessible to all personnel. CPNI data is one of two types. Customers that have verbally required that Liberty Communications not use CPNI data for marketing purposes have a check mark populated in the CPNI field and the date they opted out populated in the date field. Customers that have not opted out have nothing populated in the CPNI field or the CPNI date field. The status of the CPNI field is clearly visible and available for each customer account.

In addition, during the process of establishing a subscriber list for a marketing campaign, an electronic request is made to pull only those with CPNI data of "blank" into the list. This process ensures we do not use CPNI data to market to customers that have opted not to allow Liberty Communications to do so.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

All Liberty Communication's employees have been trained on the appropriate use of and protection of CPNI. Protection and proper use of CPNI is a Company Policy and any inappropriate use is considered a violation of such policy and subject to Corrective Action outlined in the Employee Handbook under the section "Disciplinary Policy and Procedures". Training on the new CPNI rules was conducted between 11/30/07 and 12/6/07 and the annual refresher training occurred on 12/10/08, 12/3/09, 12/11/09, 12/9/10, 12/22/10, 12/1/11, 12/6/11, 1/31/13, 2/27/14, 2/3/15, 2/2/16, 2/9/17, 1/31/18, 2/7/18, and 2/13/18.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

Campaign Data complying with this requirement is stored electronically and kept on file for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Liberty Communications' General Manager currently acts as Compliance Manager and provides approval for all marketing campaigns. The review documents and the approval date is stored electronically and kept on file for a minimum of one year.



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(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

Liberty Communications' General Manager has been designated as the Compliance Officer. Liberty Communications has had no reason to take action against data brokers in 2018 and received zero complaints of unauthorized release of CPNI during the 2018 calendar year.

(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

Liberty Communications has not experienced any problems with the opt-out mechanisms in place in 2018. In the event that such an outage occurs Liberty Communications understands its obligation to report the outage within 5 business days.

Signature



Date FEB. 13, 2019

Jerry Melick, President